

**ROGER P. CROTEAU & ASSOCIATES, LTD.**  
• 9120 W. Post Road, Suite 100 • Las Vegas, Nevada 89148 •  
Telephone: (702) 254-7775 • Facsimile (702) 228-7719

1 ROGER P. CROTEAU, ESQ.  
Nevada Bar No. 4958  
2 TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
3 ROGER P. CROTEAU & ASSOCIATES, LTD.  
9120 West Post Road, Suite 100  
4 Las Vegas, Nevada 89148  
(702) 254-7775  
5 (702) 228-7719 (facsimile)  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
6 *Attorney for Defendant*  
**THUNDER PROPERTIES, INC.**

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 \*\*\*

10 CHRISTIANA TRUST, A DIVISION OF )  
11 WILMINGTON SAVINGS FUND SOCIETY, )  
FSB, NOT IN ITS INDIVIDUAL CAPACITY )  
12 BUT AS TRUSTEE OF ARLP TRUST 3, a )  
national bank, )

Case No. 3:17-cv-00089-RCJ-VPC

13 Plaintiff, )  
14 )

15 vs. )

16 THUNDER PROPERTIES, INC., a Nevada )  
corporation; THE CLARKSON LAW GROUP, )  
P.C., a Nevada professional corporation; )  
17 FALLEN LEAF HOMEOWNERS )  
ASSOCIATION, a Nevada corporation; PAUL )  
18 E. MORDEN, an individual; CHERYL L. )  
MORDEN, an individual; DOES 1 through 10, )  
19 inclusive, and ROES 1 through 10, inclusive, )

20 Defendants. )  
21 )

22 **STIPULATION AND ORDER TO EXTEND TIME TO**  
**RESPOND TO MOTION FOR SUMMARY JUDGMENT**  
23 **(First Request)**

24 COMES NOW Plaintiff, CHRISTIANA TRUST, A DIVISION OF WILMINGTON  
25 SAVINGS FUND SOCIETY, FSB, NOT IN ITS INDIVIDUAL CAPACITY BUT AS  
26 TRUSTEE OF ARLP TRUST 3, and Defendants, THUNDER PROPERTIES, INC. and  
27 FALLEN LEAF HOMEOWNERS ASSOCIATION, by and through their undersigned counsel,  
28 and hereby stipulate and agree as follows:

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1. On November 30, 2017, Plaintiff filed a Motion for Summary Judgment herein [ECF #33]. Responses are presently due on December 21, 2017.
2. Defendants' counsel have been required to devote time and attention to numerous other pending legal matters since the filing of the Motion for Summary Judgment which have detracted from the time available prepare a response.
3. The parties are presently engaged in settlement negotiations and desire to continue these negotiations before spending additional time and resources herein.
4. Based upon the foregoing, Defendants have requested and shall be granted an extension of time until January 22, 2018, in which to respond to the Plaintiff's Motion for Summary Judgment.
5. This Stipulation is made in good faith and not for purpose of delay.

Dated this 19<sup>th</sup> day of December, 2017.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

ZIEVE, BRODNAX & STEELE, LLP

/s/ Timothy E. Rhoda  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
9120 West Post Road, Suite 100  
Las Vegas, Nevada 89148  
(702) 254-7775  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Defendant  
Thunder Properties, Inc.*

/s/ John S. Dolembro  
JOHN S. DOLEMBO, ESQ.  
Nevada Bar No. 9795  
3753 Howard Hughes Parkway, Suite 200  
Las Vegas, NV 89169  
702-948-8565  
702-446-9898 (fax)  
[sdolembro@zbslaw.com](mailto:sdolembro@zbslaw.com)  
*Attorney for Plaintiff  
Christiana Trust*

TYSON & MENDES, LLP

/s/ Margaret E. Schmidt  
MARGARET E. SCHMIDT, ESQ.  
Nevada Bar No. 12489  
8275 South Eastern Ave., Ste. 115  
Las Vegas, NV 89123  
702-724-2648  
702-938-1048 (fax)  
[mschmidt@tysonmendes.com](mailto:mschmidt@tysonmendes.com)  
*Attorney for Defendant  
Fallen Leaf Homeowners Association*

Case No. 3:17-cv-00089-RCJ-VPC  
STIPULATION AND ORDER TO EXTEND TIME TO  
RESPOND TO MOTION FOR SUMMARY JUDGMENT  
(First Request)

IT IS SO ORDERED.

By: \_\_\_\_\_

  
Judge, U.S. District Court

Dated: \_\_\_\_\_

12-21-2017

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